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10 **UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION**

13 In re:

14 **PG&E CORPORATION,**

15 - and -

16 **PACIFIC GAS AND ELECTRIC COMPANY,**

17 **Debtors.**

- 18  Affects PG&E Corporation  
19  Affects Pacific Gas and Electric Company  
 Affects both Debtors

20 \* *All papers shall be filed in the Lead Case,  
21 No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION ENLARGING TIME  
FOR GENE DESCALZI AND  
LEONARDA ROMBAOA TO FILE  
PROOFS OF CLAIM**

Related to Dkt. Nos. 6777-6781

[No Hearing Requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-  
3 captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Gene Descalzi (“**Descalzi**”) and  
4 Leonarda Rombaoa (“**Rombaoa**”, and together with Descalzi, “**Descalzi/Rombaoa**”), on the  
5 other hand, by and through their respective counsel, hereby submit this stipulation (the  
6 “**Stipulation**”) for an order enlarging the time for Descalzi/Rombaoa to file a claim in the  
7 Chapter 11 Cases as set forth herein. The Debtors and Descalzi/Rombaoa are referred to in this  
8 Stipulation collectively as the “**Parties**,” and each as a “**Party**.**”** The Parties hereby stipulate and  
9 agree as follows:

10 **RECITALS**

11 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11  
12 Cases in the United States Bankruptcy Court for the Northern District of California (the  
13 “**Bankruptcy Court**”).

14 B. By Order dated July 1, 2019 [Docket No. 2806] (the “**Bar Date Order**”), the  
15 Bankruptcy Court set October 21, 2019 at 5:00 p.m. (Prevailing Pacific Time) (the “**Original Bar**  
16 **Date**”) as the deadline in these Chapter 11 Cases for filing proofs of claim in respect of any of  
17 prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of the Debtors,  
18 including all claims of Fire Claimants,<sup>1</sup> Wildfire Subrogation Claimants, Governmental Units (as  
19 defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt,  
20 including all secured claims and priority claims.

21 C. By Order dated November 11, 2019, the Bankruptcy Court extended the Bar Date  
22 until December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time), solely for the benefit of any non-  
23 governmental Fire Claimants who had not filed proofs of claim by the Original Bar Date.

24 D. On April 15, 2020, Descalzi/Rombaoa filed the *Motion Pursuant to Fed. R. Bankr. P.*  
25 *9006(1) to Enlarge the Time for Gene Descalzi and Leonarda Rombaoa to File Proof of Claims*

27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms  
in the Bar Date Order.

1 [Dkt. No. 6777] (the “**Motion**”), in which Descalzi/Rombaoa assert they should be permitted to file  
2 late claims for damages allegedly sustained as a result of the North Bay Fires (the “**Asserted**  
3 **Claims**”). The Motion is set for hearing on May 12, 2020 (the “**Hearing**”). See Dkt. No. 6781.

4 E. On February 26, 2020, Descalzi filed Proof of Claim No. 97039, and on March 5,  
5 2020, Rombaoa filed Proof of Claim No. 97583 on account of their respective Asserted Claims that  
6 are the subject of the Motion (the “**Proofs of Claim**”). On February 26, 2020, Rombaoa filed Proof  
7 of Claim No. 97038, which is a substantive duplicate of Proof of Claim No. 97583 (the “**Duplicate**  
8 **Proof of Claim**”).

9 F. The Debtors have raised with the Descalzi/Rombaoa certain informal objections to  
10 the relief requested in the Motion.

11 G. The Official Committee of Tort Claimants has reviewed the Stipulation and, based on  
12 the facts presented in the Motion, has no objection to the agreements set forth herein or to entry of an  
13 Order approving the terms of the Stipulation.

14 H. The Parties hereto desire to resolve their issues regarding the Motion.

15 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
16 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
17 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
**UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
**TO ORDER, THAT:**

18 1. The Proofs of Claim shall be deemed timely filed.

19 2. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors  
20 or any other party in interest of any right to (i) object to the Asserted Claims or the Proofs of Claim  
21 on any grounds other than the untimely filing thereof, or (ii) seek to reclassify the Proofs of Claim.

22 3. Nothing herein is intended to, nor shall it be construed to be, a waiver by  
23 Descalzi/Rombaoa of their right to seek to reclassify the Proofs of Claim or to assert any other right  
24 in contravention to or in opposition of any asserted challenge to the Proofs of Claim.

25 4. The Duplicate Proof of Claim shall be deemed expunged, and Prime Clerk LLC, the  
26 claims agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims  
27 register to reflect the terms set forth herein.

5. Upon entry of an Order approving the Stipulation, the Motion shall be deemed withdrawn and the Hearing vacated.

6. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court, it shall be null and void and have no force or effect and the Parties agree that, in such circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

7. This Stipulation shall be binding on the Parties and each of their successors in interest.

8. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersede all prior agreements and understandings relating to the subject matter hereof.

9. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

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1 Dated: April 27, 2020  
2 WEIL GOTSHAL & MANGES LLP  
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5 /s/ Matthew Goren  
Matthew Goren, Esq.  
6 *Attorneys for Debtors  
and Debtors in Possession*  
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Dated: April 27, 2020  
THE LAW OFFICES OF ARSEN  
SARAPINIAN, P.C.

5 /s/ Arsen Sarapinian  
Arsen Sarapinian, Esq.  
6 *Attorneys for Gene Descalzi and Leonarda  
Rombaoa*  
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